

# EXHIBIT 71

**DECLARATION UNDER PENALTY OF PERJURY**

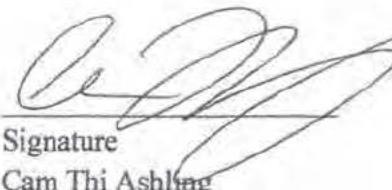
**PURSUANT TO 28 U.S.C. § 1746**

1. My name is Cam Thi Ashling. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County in Georgia and my residence address is [REDACTED]  
[REDACTED] Atlanta, GA 30342.
3. I am a Chairman of Georgia Advancing Progress PAC and a longtime Community Leader for the local Asian American Community who assisted Mrs. Ngoc Anh Thi Tran in her attempt to vote in the 2018 General Election.
  - a. For the 2018 Georgia General Election, I was canvassing for my nonprofit to help people early vote.
  - b. On November 1, 2018, I randomly met an almost 80-year-old woman, Mrs. Ngoc Anh Thi Tran, who lives at [REDACTED] Norcross, GA 30037. She decided to vote early after speaking with me about the importance of doing so.
  - c. She did not speak much English and had no idea where to go to vote. Luckily, I was able to communicate with her in Vietnamese and knew how to find any information she may need.
  - d. I was going to drive her to her polling location but wanted to check her registration status first. When I checked the Secretary of State's website for her registration status, it said that her file was not active and to call the Gwinnett County Board of Elections. I then called the Gwinnett County Board of Elections. They found her file and said that we had to go in person to the Gwinnett County Board of Elections and prove her citizenship.
  - e. The Board of Elections informed us that her name was not an exact match in the database and that she was listed as a man. The only way to rectify the situation would be to provide her naturalization paperwork, which she received such a long time ago that she could not remember where to find it. Mrs. Tran's husband found the paperwork that the Gwinnett County Board of Elections required her to have so that we could correct the state's error and enable her to vote.
  - f. We then had to drive all the way to Lawrenceville to the Gwinnett County Board of Elections to provide the paperwork. I took Mrs. Tran in my car and we stopped to grab some lunch on the way because the day had already gotten unexpectedly long. We had to stand in line at the Gwinnett County Board of Elections and I could see Mrs. Tran getting tired. We were both frustrated with all of the hoops

that she had to jump through. After a while, the Board of Elections staff noticed Mrs. Tran's age and moved us to the front of the line.

- g. The Board of Elections staff informed us that Mrs. Tran's voter status was pending due to the exact match issue with her name as well as her gender being incorrectly reported. A lot of Vietnamese names are several names separated. Often times all of the names get jammed together in an attempt to fit the registration system requirements. The exact match issue occurred because one space was missing from her name. They corrected her name and gender, and took her off of pending status. It is frustrating to me that our voting system that is not designed to accommodate names like hers. Such a simple difference that is out of her control could have kept Mrs. Tran from voting.
  - h. Once we got Mrs. Tran off of the pending list, she was given a ballot. I stayed with her so that I could translate the ballot and guide her through the process that had already proven to be extremely difficult to navigate. Mrs. Tran was able to cast her ballot eventually, well after all of the trouble that we had to go through to fix the issues that should have been the state's burden to correct. We spent an entire day working to make sure that she could exercise her right, as an American citizen, to vote. Her participation in this election was neither free nor fair, and without my assistance, she would not have cast a ballot in an election that she was very excited to participate in.
4. I give this Declaration freely, without coercion, and without any expectation of compensation or other rewards.
  5. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in any way as anything other than a witness in this litigation.
  6. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 9<sup>th</sup> day of October, 2019.



Signature  
Cam Thi Ashling